

U.S. Department of Justice



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 3, 2022

By ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Minh Quang Pham*
S1 12 Cr. 423 (RMB)

Dear Judge Berman:

The Government respectfully writes with respect to the conference in this matter scheduled for October 6, 2022 at 11:00 a.m. As discussed during the June 27, 2022 status conference and referenced in previous correspondence (*see* Dkt. No. 246), the parties continue to discuss a pre-trial resolution of this matter. However, as previewed by the Government during that conference, because of the nature of this case, the Government must obtain authorization from various governmental components to extend any plea offer. The Government is in the process of doing so and anticipates that it will be in a position to extend a plea offer in the coming weeks.

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Accordingly, in order for the Government to obtain authorization to extend a plea offer and to afford the defendant time to consider that offer, the Government respectfully requests that the October 6 conference be adjourned for approximately 30 days, at which point the parties anticipate being able to advise the Court whether there will be a pre-trial disposition of this matter. Counsel for the defendant does not object to this request, and consents to the exclusion of time under the Speedy Trial Act through the date of any rescheduled conference, in order to continue discussions about a possible disposition of this case.

Respectfully submitted,

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Cc: Defense Counsel (ECF)